

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE PERIOD
APRIL 4, 2023 THROUGH AUGUST 11, 2023**

Debtor: LTL Management LLC Applicant: Genova Burns LLC
Case No.: 22-12825(MBK) Client: Official Comm of Talc Claimant
Chapter: 11 Case Filed: April 4, 2023

**SECTION 1
FEE SUMMARY**

Interim Fee Application No. _____ or ☒ Final Fee Application¹

Summary of Amounts Requested for the Period from April 4, 2023 through August 11, 2023²

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	\$ <u>0.00</u>	\$ <u>0.00</u>
Total Fees Allowed To Date:	\$ <u>0.00</u>	\$ <u>0.00</u>
Total Retainer (If Applicable)	\$ <u>N/A</u>	\$ <u>N/A</u>
Total Holdback (If Applicable)	\$ <u>210,306.00</u>	\$ <u>0.00</u>
Total Received By Applicant	\$ <u>647,502.00</u>	\$ <u>18,943.37</u>

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
1. Angelo J. Genova, Partner	1979	.50	900.00	450.00
2. Daniel M. Stolz, Partner	1980	703.40	800.00	562,720.00
3. Daniel M. Stolz, Partner	1980	17.80	400.00	7,120.00
4. Donald W. Clarke, Partner	2008	464.10	600.00	278,460.00
5. Donald W. Clarke, Partner	2008	13.30	300.00	3,990.00
6. Scott S. Rever, Counsel	1994	32.10	600.00	19,260.00
7. Gregory S. Kionoian, Counsel	1992	327.90	600.00	196,740.00

¹ Additional fees may be sought for services related to appeals, pursuant to the August 11, 2023 Dismissal Order.

² The within final fee application includes time and expenses for the period 4/4/23 through 4/14/23, as a motion is pending before the court to make the effective date of the retention of TCC professionals 4/4/23, or to allow the fees and expenses for such period as a substantial contribution to this bankruptcy case.

8. Gregory S. Kionoian, Counsel	1992	9.00	300.00	2,700.00
9. Sydney S. Schubert, Junior Associate	2022	46.70	275.00	12,842.50
10. Sydney S. Schubert, Junior Associate	2022	2.60	137.50	357.50
11. Lorrie Denson	Paralegal	164.80	250.00	41,200.00
12. Silas H. Lam	Paralegal	1.70	250.00	425.00
13. Denise Sichenze	Paralegal	9.80	250.00	2,450.00
14. Patti McCurrie	Paralegal	17.00	250.00	4,250.00
15. Maria A. Sousa	Paraprofessional	16.90	250.00	4,200.00

Fee Totals: \$ 1,137,165.00

Disbursements Totals: \$ 32,548.92

Total Fee Application \$ 1,169,713.92

**SECTION II SUMMARY
OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) Asset Disposition Sales, leases, abandonment and related transaction work.		
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.		
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	.10	60.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	1,406.70	916,932.50
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	1.60	400.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	92.90	26,200.00
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	.10	60.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	131.20	78,870.00
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	8.40	5,040.00
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	14.10	9,260.00

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	.90	540.00
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.		
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.		
v) Valuation Appraise or review appraisals of assets.		
w) Travel Time	42.70	14,167.50
SERVICE TOTALS:	1,698.70	\$1,137,165.00

SECTION III SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	596.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	2,286.17
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	
d) Fax Include per page fee charged.	

e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	
f) In-house Reproduction Services Exclusive of overhead charges.	517.50
g) Outside Reproduction Services Including scanning services.	
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	
i) Court Reporting Transcripts.	3,212.40
j) Travel Mileage, tolls, airfare, parking.	839.27
k) Courier & Express Carriers Overnight and personal delivery.	252.11
l) Postage	202.21
m) Other (specify) Meals, subpoenas, litigation support vendors, other professionals	24,643.26
DISBURSEMENTS TOTAL:	\$32,548.92

I certify under penalty of perjury that the above is true.

Date: September 8, 2023

/s/ Daniel M. Stolz
DANIEL M. STOLZ